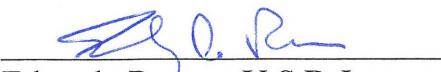


MEMO ENDORSED

DAVID J. GRECH
DGRECH@GRSM.COM

Defendant's request to adjourn the October 6, 2022 pre-trial conference is denied. SO ORDERED.



Edgardo Ramos, U.S.D.J

Dated: October 5, 2022

New York, New York

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October 4, 2022

VIA ECF

The Honorable Edgardo Ramos, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Courtroom 619
New York, NY 10007

Re: Dedra De La Rosa v. Elmwood NYT Owner, LLC and Bowlmor Times Square, LLC
Case No.: 1:22-cv-02300-ER

Dear Judge Ramos:

We have recently appeared, on September 13, 2022, on behalf of defendant Elmwood NYT Owner, LLC (“Elmwood”) in this case. Given this development, Elmwood and our office require additional time to have discussions with counsel for the other parties in preparation for an Initial Conference with the Court. Thus, we write, pursuant to Section 1.E of Your Honor’s Individual Practices, to respectfully request an adjournment of the Initial Conference, presently scheduled for October 6, 2022.

We have conferred with counsel for the other parties to this case regarding our request. Both counsel for the Receiver for Elmwood and counsel for co-defendant/tenant Bowlmor Times Square, LLC consent. Counsel for Plaintiff do not consent and provided the following as the reason for their refusal: “There have been no discussions, and defendants have already have extended time to review any filings.” This represents our office’s first for an extension or adjournment of any kind in this case.

We thank the Court for its attention to this matter and consideration of this request.

Respectfully submitted,

/s/ David J. Grech

David J. Grech

cc: All Attorneys of Record (*via ECF*)